

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

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**LARRY D. THOMAS,**

**Plaintiff,**

**VS.**

**R. JAMES NICHOLSON,  
SECRETARY, DEPARTMENT OF  
VETERANS AFFAIRS,  
Defendants.**

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**CIVIL ACTION NO. 2:05-CV-437-W**

**MOTION TO WITHDRAW AS COUNSELS**

**COME NOW** Juraldine Battle-Hodge and Zachary T. Collins, attorneys at law,  
and respectfully move this Honorable Court to allow them to withdraw from further  
representation Plaintiff, Larry D. Thomas, in this case and state the following reasons  
therefore:

1. That the undersigned were retained on this case on June 7, 2005;
2. That the undersigned have been unable to effectively communicate with the Plaintiff;
3. That there has been an irreconcilable breakdown of the attorney-client relationship;
4. That the Plaintiff has refused to cooperate with the undersigned in completing requested discovery;
5. That as a result, the undersigned have been unable to cooperate with the Defendants' discovery requests;

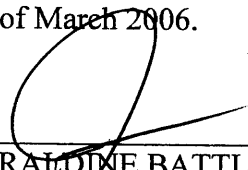
6. That the undersigned have communicated with the Plaintiff their intent to withdraw as counsels in the above-mentioned matter;

7. That no hearings have been set for this case, and

8. That as a result, the Plaintiff will not be prejudiced by allowing the undersigned to withdraw as counsels.

**WHEREFORE, PREMISES CONSIDERED**, the undersigned counsels pray that this Honorable Court will grant their Motion to Withdraw.

Respectfully submitted this the 16<sup>th</sup> day of March 2006.



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JURALDINE BATTLE-HODGE (BAT033)  
ZACHARY T. COLLINS (COL126)  
Attorneys for the Plaintiff

OF COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 16<sup>th</sup> day of March 2006, the foregoing document was served upon the following counsels of record by placing a copy of the same in the U.S. Mail,

First Class postage prepaid, addressed as follows:

Randolph Neeley  
Assistant United States Attorney  
United States Attorney's Office  
P.O. Box 197  
Montgomery, AL 36101-0197

**Plaintiff**

Larry D. Thomas  
3327 Luncerford Street  
Montgomery, AL 36108

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Of Counsel